

1 A I don't know.

2 Q Will it be the salesperson?

3 A I don't know.

4 MR. SHUBERT: Objection, Your Honor.

5 WITNESS: Perhaps --

6 MR. SHUBERT: She says she doesn't know.

7 WITNESS: Perhaps I'll hire a salesperson who also

8 knows how to do traffic.

9 BY MR. GAMMON:

10 Q How much time is taken up in traffic. What, what

11 does that job entail?

12 A I think it probably --

13 Q Is that a full-time job?

14 A It depends on the station.

15 Q It depends on the amount of business you have on the

16 station, doesn't it?

17 A Exactly. To begin with it usually doesn't take up

18 much.

19 Q Well, do you anticipate that your station is going

20 to have business on it and be profitable?

21 A Yes.

22 Q It's indicated here that -- who's going to -- who

23 are you going to supervise in engineering? The engineering

24 department?

25 A An engineer.

1 Q But you don't -- you didn't provide in your budget
2 for an engineer, did you?

3 MR. SHUBERT: Objection. There's no predicate laid
4 for that.

5 JUDGE LUTON: Predicate? Did you provide in your
6 budget for an engineer?

7 WITNESS: I didn't, I didn't in my budget provide
8 for a full-time engineer.

9 BY MR. GAMMON:

10 Q Are you telling us you provided in your budget for a
11 part-time engineer?

12 A In my budget I left a lot of padding so that if I
13 had to hire part-time people I could.

14 Q What is the answer to my question? You don't know
15 if you did or not?

16 MR. SHUBERT: Would you repeat the question?

17 MR. GAMMON: I'm sorry, Your Honor.

18 MR. SHUBERT: I'm objecting to your question.

19 MR. GAMMON: This is really unfair. If the witness
20 needs the question repeated -- let me continue.

21 BY MR. GAMMON:

22 Q What did your budget provide? For a part-time
23 engineer or not?

24 A My budget did -- I don't think I mentioned a budget
25 -- I mean an engineer in my budget.

1 Q All right. Now, what are you going to do to
2 supervise the station's construction? What will your function
3 be in doing that?

4 A I'll be the general contractor.

5 Q You're going to let bids? For, for what? What,
6 what, what does that mean, general contractor? In the context
7 of your station?

8 A It means that I'm going to find the right people to
9 build the station at the right price.

10 Q What is the construction -- what will the
11 construction involve?

12 A There will not be much construction. I'm using an
13 existing tower. I'm also using an existing building.

14 Q What building?

15 A On Mount Saint Helena.

16 Q Transmitter building?

17 A Yes.

18 Q What, what -- will there be construction of the
19 studio building?

20 A There'll be construction of the studio building in
21 Calistoga?

22 Q And you'll oversee that?

23 A I'll oversee that. Yes.

24 Q What other construction will you oversee? As you
25 see your function?

1 A Whatever construct-- other construction needs to be
2 constructed.

3 Q Have you finished your answer?

4 A Yes.

5 Q All right. Did you discuss -- did your husband
6 discuss a proposed site for your application with Len Pringle?

7 A No.

8 Q How do you know that?

9 A Because I've discussed it with him since then. Your
10 continued line of, of questioning has been trying to show that
11 my husband is directly involved with my radio station, which
12 he is not. I'm sorry if I appear defensive, but --

13 Q No. I'm just asking how you know that?

14 A Because I've asked him.

15 Q Thank you. Has your husband ever discussed site
16 with you, your proposed site or sites -- either site with you?

17 A Where I live in Calistoga, we both look at that site
18 every day. It -- we -- our house directly faces Mount Saint
19 Helena, so yes we have discussed the site. It's part of our
20 landscape.

21 Q You've discussed it only in terms of it being a
22 landmark you can look at?

23 A We've just discussed it in terms of that's, that's
24 where my tower is going, is going to be or is.

25 Q Do you have any information at all that your husband

1 has had any discussions with any other person besides yourself
2 with respect to your proposed use of the site on Mount Saint
3 Helena?

4 A Not concerning my site.

5 Q What discussions have you had with your husband
6 about your application? Take us to the first one, please, and
7 go forward from there.

8 A The first what?

9 Q Discussion you've had with your husband about your
10 application.

11 A Are you asking that I recall specific discussions
12 that I've had with my husband for the past two years?

13 Q Have there been many over that period of time?

14 A This -- well, part, part of it is because we've
15 discussed -- we're moving to Calistoga. As I told you before,
16 they've been very general discussions.

17 Q Yes. I'm trying to find out what they are, you see.
18 Why don't you take us to the first one you had --

19 A I don't recall the first discussion.

20 Q Before the application was filed.

21 A I'm sorry. I don't recall.

22 Q Well, that was -- would be in 1991, the fall of the
23 year, wouldn't it?

24 A I don't recall.

25 Q Do you recall discussing your application with --

1 and matters about your application with your husband before
2 you filed the application or do you not?

3 A I told him that it was something I wanted to do.

4 Q Well, then that was before your application was
5 filed?

6 A Yes.

7 Q What did he say to that?

8 A My husband is very supportive of me.

9 Q What did he say?

10 A I don't recall exactly what he said.

11 Q Were there any other discussions with your husband
12 before the application was filed?

13 A I don't recall.

14 Q Well, you do recall that he confirmed to you the use
15 of your counsel and your legal counsel and engineering
16 counsel, right?

17 A That's right.

18 Q You told us that this morning.

19 A Yes.

20 Q Were there any other conversations with your
21 husband? What was the next one after your application was
22 filed? The next time you discussed anything about your
23 application?

24 A I don't recall.

25 Q All right. This has been all within the last year

1 and a half, right?

2 A Yes.

3 Q Have there been so many you can't separate them, or
4 you just can't remember the substance of, of the conversations
5 you've had on this, on this topic or what?

6 MR. SHUBERT: Objection.

7 MR. GAMMON: What are you telling us?

8 MR. SHUBERT: Compound question.

9 BY MR. GAMMON:

10 Q It certainly was. What are you telling us?

11 A I'm sorry. Would you please repeat that last
12 question?

13 Q What are you telling us when you say you can't
14 recall? You can't recall because there are so many?

15 A I'm saying that I talk to my husband --

16 Q You can't recall because they're so vague in your
17 mind? What?

18 A I'm saying that I talk to my husband every day.

19 Q About your application?

20 A No, not about my application. My application is --

21 Q That's all I'm asking about, ma'am.

22 A My application is my application. It's part of my
23 life.

24 Q I understand that.

25 A And he's very interested in my life.

1 Q I'm just asking what your husband -- I understand
2 this is important to you.

3 A What is important to me is that it is --

4 Q Ma'am, please --

5 A -- my application.

6 Q -- please don't, please don't make speeches.
7 Really. Just answer the question. I'm asking about what it,
8 what it -- what is it in your mind that makes you unable to
9 recall the conversations with your husband about your
10 application since it was filed in '91? Can you, can you help
11 us, ma'am?

12 A Because I don't -- I can't think of any point that
13 is something that I would remember or write down in my journal
14 or make a notation of it that is something I should remember
15 about our conversation.

16 Q Do you have a journal?

17 A You're asking very general information.

18 Q Do you have a journal?

19 A I keep a Daytimer, yes.

20 Q Does it relate to your application and the matters
21 and facts and circumstances of your application in any way?

22 A Yes, it does.

23 Q Was that turned over in discovery?

24 A No, excuse me. I had my purse stolen last November
25 and so I do not have it any longer.

1 Q Well, how, how long -- how back -- far back does
2 your journal go?

3 A It goes for a year.

4 Q Well, then, for the past year have you written
5 entries into it? About your application? Relating in any
6 way?

7 A In some ways, yes. I mean, it's not something I
8 write everything down, but I do write a lot -- I do write a
9 lot of things down in my, in my Daytimer. Usually just day-
10 to-day, day-to-day things.

11 Q I understand.

12 MR. GAMMON: Will that be turned over, counsel,
13 under the document production?

14 MR. SHUBERT: I don't know whether it's in the scope
15 as we sit here frankly. If it is -- I mean I just -- this is
16 the first I've learned about it.

17 BY MR. GAMMON:

18 Q Might your journal have reflected conversations you
19 had with your husband about your application?

20 A Absolutely not. No.

21 Q Those would certainly not be in there?

22 A No, no. The journal would reflect who I was playing
23 tennis with and where I was -- you know, what groceries I was
24 buying for that day. Very trivial things.

25 Q But you've already told us that it would relate

1 sometimes matters about your application, ma'am. Or are you
2 withdrawing that now?

3 A It would probably -- if I was on a trip to
4 Washington, D.C., I would probably write that down in it. But
5 I did not make a journal entry every time I made a telephone
6 call or had a conversation with my husband. I was just trying
7 to make that point. I'm sorry.

8 Q No one's trying to suggest that.

9 A Okay. I thought you were. I'm sorry.

10 Q Just been looking for the items -- well, I think
11 we've established -- maybe you're walking away from it. Tell
12 me. Are there matters written in the journal which you did
13 keep that relate to your application?

14 A No.

15 Q You're positive of that?

16 A The matters -- I would have the names and addresses
17 of my attorney and my engineer. Things like that. In, in an
18 information part of the journal.

19 Q In the journal or in the address part of it?

20 A In the address part of it.

21 Q I'm just talking about your journal. You've already
22 told us, I thought, that sometimes you might relate something
23 about your application in your journal. Now, you've told us
24 absolutely not. Now, which is it?

25 A No, I'm sorry. I didn't say that. You said it.

1 Q Oh. Well, which is it?

2 A I usually don't.

3 Q But might you have?

4 A As I said, usually it's just a very day-to-day what
5 I'm doing that particular day. What groceries I'm buying.
6 Very trivial things.

7 Q Or something that happened about your application if
8 it was important enough?

9 A No, I didn't -- I did make -- I didn't go -- I don't
10 go back and annotate what -- the journal.

11 Q I didn't ask you about annotating the journal. I'm
12 asking as you recount in the journal on that day, things that
13 happened that day? You're telling us absolutely there's
14 nothing in that journal that would relate in any way to your
15 application.

16 A I don't think so.

17 MR. SHUBERT: Your Honor, if I may.

18 BY MR. GAMMON:

19 Q I know you don't think so, but you -- do you know
20 whether or not?

21 A No, there's nothing in my journal that will relate
22 to my application.

23 Q You're positive?

24 A Other than -- no. Not in the journal itself. No.

25 Q You're positive of that?

1 A I'm positive of that.

2 Q Let me ask you some questions about your civic
3 situation, ma'am. You joined the -- I'm on page 3 of your
4 Exhibit 2.

5 MR. SHUBERT: That's Hearing Exhibit 2?

6 MR. GAMMON: Page 3, Exhibit 2 -- Hearing Exhibit 2.

7 MR. SHUBERT: Hearing Exhibit 2.

8 BY MR. GAMMON:

9 Q It's indicated there at the second sentence that
10 since February of 1992, Mrs. Constant has been a member of the
11 Calistoga Chamber of Commerce. Do you see that?

12 A Yes.

13 Q Do you do anything there except -- have you done
14 anything there except pay your dues really?

15 A I was -- received a monthly newsletter and various
16 -- a lot of correspondence from the Chamber of Commerce.

17 Q Ma'am, I said what have you done?

18 A I haven't done anything other than belong.

19 Q Okay. Okay. That's all I asked you. You -- I see
20 a little farther down, since June of 1992 you've been a member
21 of the Daughters of the California Pioneers. Do you see that?

22 A Yes.

23 Q Okay. Is that an organization, maybe akin to the
24 DAR, where they go back in heritage?

25 A It's a, it's a genealogical association. You're

1 right.

2 Q Okay. You -- you're eligible for joining if you're
3 a direct descendant of someone who entered California prior to
4 January 1, 1849?

5 A Yes.

6 Q Is that the Gold Rush date?

7 A Yes. They're 49er's.

8 Q And you qualified I, I, I have to assume for
9 membership.

10 A Yes, I did.

11 Q And you don't do anything with that organization,
12 undertake any functions or responsibilities or leadership
13 positions or anything?

14 A No, I don't.

15 Q All right. The Terwillager Nature Center, I think
16 we established this morning that was located in -- well, it
17 says here, in Corte Madera, at the very top of page 4. Now,
18 that's outside your proposed 1 mV, isn't it?

19 A The nature center itself is located outside of that,
20 that area.

21 Q Okay. Do you know, of your own personal knowledge,
22 that anyone from, from your service area, proposed service
23 area, actually has gone to that Terwillager Nature Center
24 beside yourself?

25 A I'm sorry. Would you please explain what you mean

1 by that? You mean, does -- students from my proposed area do
2 go to the Terwillager Nature Center --

3 Q You have personal knowledge of that?

4 A Yes. I've taken many of them on field trips myself.

5 Q Okay. And what schools would those have been,
6 ma'am?

7 A Oh, I don't recall the schools. It's basically
8 grades 1 through 4 in Sonoma and Napa, Marin, San Francisco
9 counties.

10 Q All right. What is the Napa/Sonoma Junior Service
11 League referred to at the top of page 4, third line?

12 A Napa/Sonoma Junior League?

13 Q Um-hum. Yes.

14 A It's a charitable organization in Napa County. Its
15 focus is on child abuse.

16 Q And you joined that oh, about seven months ago or
17 so?

18 A Yes. Last fall.

19 Q November of '92, to be exact.

20 A That's right.

21 Q Okay. And you're just a member there?

22 A I'm just a member.

23 Q Actually, oh, I'm sorry. It's -- you're a
24 provisional member.

25 A Provisional member, yes.

1 Q Okay. Ma'am, you, you told us that you could not
2 recall the general discussions with your husband about your
3 application. Does that mean you could not recall
4 approximately when they occurred or what the substance of the
5 conversations and discussions were?

6 A Both.

7 Q Okay. There's a references from time to time in
8 these documents to Marinship/Yacht Harbor in Sausalito. Could
9 you tell us what's there in reference to your life?

10 A I know. Where are the references to them?

11 Q Okay. Well, in various of the documents -- let's
12 see if I can find one. Yes, here's one. It's one of the
13 documents produced to us. It's an FAA notice. Notice of
14 Proposed Construction or Alteration with a name and address of
15 the individual company or corporation proposing the
16 construction. It's an FAA notice.

17 A Um-hum.

18 Q Lists it to be --

19 MR. GAMMON: If I could approach the witness, Your
20 Honor, I'll read it in front of you so we don't have to put it
21 in evidence. It lists --

22 MR. SHUBERT: I'm sorry. I just want to look at
23 this --

24 MR. GAMMON: Surely.

25 BY MR. GAMMON:

1 Q Ms. Mary Constant, Moonbeam, Inc., 1 Marinship/Yacht
2 Harbor, Sausalito, California 94965. It appears to be your
3 address.

4 A I have an office there -- I had an office there.

5 Q Okay. In 1991 I take it?

6 A Yes.

7 Q Well, this was a date, I'm sorry, it was the date
8 February 24, 1992.

9 A Yes. I had an office there.

10 Q What, what, what -- during what period of time did
11 you have an office there?

12 A Off and on. It's, it's a houseboat I own.

13 Q Does your husband have his office there too?

14 A He -- sometimes he had his office there.

15 Q He had his broadcast offices there, didn't he?

16 A No, he never had his broadcast offices there.

17 Q He did not?

18 A I don't think he did. No. He hasn't had any
19 broadcast interest for, oh, five or six years and I didn't --
20 we didn't own the houseboat way back then. No.

21 Q Ma'am, how can you tell us he didn't have any
22 broadcast interests for the last five or six years?

23 A He has not owned any radio stations, with the
24 exception of the one he now owns in Ketchum for the past five
25 or six years.

1 Q He sold his radio stations in July of 1989, didn't
2 he?

3 A How many years ago was that?

4 Q Four.

5 JUDGE LUTON: This is deteriorating really into a
6 kind of a back and forth general discussion. I thought you
7 were asking about a particular place and an office and
8 suddenly we're arguing about whether her husband had radio
9 interests or didn't have them or something. Please.

10 MR. GAMMON: My information is that the husband did
11 office and receive correspondence and service of lawsuits at
12 that address.

13 JUDGE LUTON: Well, the witness hasn't agreed with
14 your information. What are you going to do about that?

15 MR. GAMMON: Well, I'll ask a question.

16 JUDGE LUTON: All right.

17 BY MR. GAMMON:

18 Q Did, did -- isn't it a fact that your husband has
19 received service of lawsuits at that address, ma'am?

20 A I don't know.

21 Q All right. Let's go to your direct case again,
22 Exhibit 2, page 4, paragraph number 10. It's indicated in the
23 first sentence there that -- wait a minute. I'm sorry. It's,
24 it's the next paragraph, ma'am. It's paragraph 11. I'm
25 sorry. At line 19 in paragraph 11 there, you state that you

1 are presently licensed as a realtor in California with James
2 E. Warren and Son realtors in Saint Helena. Do you see that?

3 A Yes.

4 Q And your license is actually -- as I read this, your
5 license is held by the Warren Company. Is that right?

6 A Yes, it is.

7 Q Is that because to, to function as, as a realtor you
8 need a license and your broker has to hold the license?

9 A Yes. I don't have the ability to sell or list real
10 estate without being under the auspices of a licensed broker.

11 Q Because you're licensed to sell under a broker, but
12 you're not licensed to be a broker?

13 A That's right.

14 Q Okay. And -- oh, I see. The purpose of putting
15 this in is because Saint Helena's located within 1 mV contour
16 of your station. Is that it?

17 A That's right. Where I was planning to move.

18 Q All right. How do you know that you have a, a real
19 estate license?

20 A I received it in the mail. And I was eligible and I
21 did join the Napa Vall-- the Napa County Board of Realtors who
22 also had to receive the same paperwork.

23 Q And do you actually have any functioning job
24 function with the Warren Company?

25 A I'm an active realtor there.

1 Q Oh, you are? What's the last thing you did as an
2 active realtor at the Warren Company?

3 A Being an active realtor doesn't mean I'm actively
4 going out and looking or listing real estate every day. I
5 have functioned as a realtor who's been showing property in
6 the area.

7 Q When was the last time you did anything like that?

8 A A couple of weeks ago. I have a client who's
9 interested in buying some land in Calistoga.

10 Q Well, would there be sanctions if you had not been
11 licensed for you to do that kind of thing?

12 A I'm sorry. I don't understand what you said?

13 Q Well, if you didn't have a real estate license, an
14 operative real estate license, you couldn't do that. It would
15 be against the law, wouldn't it?

16 A You know, I don't know. I don't know what the items
17 are. I'm not familiar with the law. I'm just another citizen
18 showing someone else property.

19 Q You're a realtor showing someone else property?

20 A Right. You were, you were supposing that if I
21 didn't have a realtor's license. Is that what you're saying?
22 I don't know the consequences.

23 MR. GAMMON: Your Honor, I ask you to identify as
24 Willson Exhibit 4 a one-page document and I ask for permission
25 to hold one back from the reporter, Your Honor. We're running

1 short today.

2 JUDGE LUTON: All right.

3 MR. GAMMON: The document purports to be -- to have
4 reference to salesperson Constant, Mary F. with an Nicasio,
5 California address, indicating that the conditional
6 salesperson license was suspended on May 23, 1993.

7 JUDGE LUTON: Let's mark this 4 for identification
8 -- Willson 4.

9 (Whereupon, the document referred to
10 as Willson Exhibit No. 4 was marked
11 for identification.)

12 BY MR. GAMMON:

13 Q Have you never seen this before?

14 A Yes. This just means that I have to supply them
15 with some information regarding educational requirements.

16 Q Did this come as a surprise to you?

17 A Oh, no. Not at all.

18 Q Do you plan to be -- you, you knew in advance you
19 would be suspended?

20 A I knew -- yes, I did.

21 Q As a matter of fact they sent you a --

22 A I mean I planned to sub -- I mean I planned to
23 supply them with the information to reinstate the license.

24 Q You do plan to do that?

25 A Yes, I do.

1 Q Did you know that you were going to be suspended
2 before you found out you were suspended?

3 A Yes. I knew the time frame. I was in the process
4 of moving and I'm sorry I didn't have time to take the class
5 at the time that I knew I had to.

6 MR. GAMMON: I ask Your Honor that you identify ask
7 Willson Exhibit 5, a one-page document at the top stamped
8 Department of Real Estate, San Francisco, California, and
9 giving a date. It's a one-page document dated May 19, 1993,
10 which indicates that it provides notice to a Mary F. Constant
11 that the conditional salesperson license will be suspended if
12 education requirement per Section 10153.4 has not been met by
13 5/22/93.

14 JUDGE LUTON: That's marked as Willson 5 for
15 identification.

16 (Whereupon, the document referred to
17 as Willson Exhibit No. 5 was marked
18 for identification.)

19 BY MR. GAMMON:

20 Q Did you receive this document on or about May 19,
21 1993?

22 A Yes, I did.

23 MR. GAMMON: Your Honor, I ask that Exhibits 4 and 5
24 be received in evidence.

25 JUDGE LUTON: Any objection?

1 MR. SHUBERT: Yes, Your Honor. I object. I object
2 on the grounds that these are unsponsored documents. We know
3 nothing about them. They could have been created on any
4 typewriter. We -- the, the veracity and the efficacy of these
5 documents are totally open.

6 MR. GAMMON: The witness --

7 JUDGE LUTON: But the information --

8 MR. SHUBERT: No, that's, that's not what she said.

9 JUDGE LUTON: Well, did you receive these documents?
10 Have you seen them before?

11 WITNESS: Yes. This license is suspended. It's not
12 revoked.

13 JUDGE LUTON: Yeah, I understand. But did you
14 receive these particular papers in the mail or something?

15 WITNESS: Yes, I did.

16 JUDGE LUTON: She's received them. She's told us
17 what they are. She's also told us that the information that
18 they, they give us is correct.

19 MR. SHUBERT: Are these the precise doc -- I mean,
20 may I voir dire?

21 JUDGE LUTON: No. The witness is -- you can --
22 you'll have redirect examination.

23 MR. SHUBERT: Except the problem is is it -- will it
24 be admitted. Okay. I'll take it under reconsideration at
25 that point in time.

1 JUDGE LUTON: I don't --

2 MR. SHUBERT: Ask you to reconsider your --

3 JUDGE LUTON: Reconsider? The, the witness has --

4 WITNESS: Excuse me. I, I'm sorry. I didn't
5 receive -- I received this information. I didn't receive
6 these documents. Someone created these, these documents.

7 MR. SHUBERT: That's precisely the point, Your
8 Honor.

9 WITNESS: The real estate office --

10 JUDGE LUTON: But the information that one derives
11 from the documents, is it true or false?

12 WITNESS: The information is true.

13 MR. SHUBERT: It's already in the record, Your
14 Honor. She testified to it.

15 JUDGE LUTON: Then the documents won't hurt. I'm
16 going to receive them -- 4 and 5 are received.

17 (Whereupon, the documents referred to
18 as Willson Exhibit Nos. 4 and 5 were
19 received into evidence.)

20 MR. GAMMON: May I have a moment, Your Honor?

21 JUDGE LUTON: Yes.

22 BY MR. GAMMON:

23 Q Take a look at transcript 43 and 47 -- 43 through
24 47, please, of your deposition. This deposition was given in
25 early June of this year. When you gave these answers about

1 your, your job function and all with the Warren Realty
2 operation, you were aware that your license had been
3 suspended, weren't you?

4 A No, because actually this actually got -- the
5 information actually got to me late because I think they're
6 still sending it to my old address in Nicasio. Actually it
7 does have the Nicasio address on it. Reinstating it is a
8 matter of taking a class that will take about two days and
9 sending the information to Sacramento. It's a very rote thing
10 in the real estate world.

11 Q Well, when did you rec -- the best you can tell us,
12 when did you receive the notice, the May notice, that you're
13 license -- real estate license had been suspended?

14 A Well, I don't know. It said that it was issued on
15 the end of May, so it probably took at least, knowing Nicasio,
16 it probably took at least a week to get to me. I think they
17 hold the mail and then bundle it up and send it once a month.

18 Q So it would have been some time around your
19 deposition time?

20 A It would have been after the deposition.

21 Q After the deposition. Over a month ago?

22 A Over a month ago.

23 Q Did you submit any transcript corrections to the
24 deposition or clarification at all to let us know that it was
25 really suspended?

1 A It's something I completely forgot about. As I
2 said, it's just a matter of taking a class for one day and
3 sending it to Sacramento.

4 Q I guess the answer to my question is no, you didn't.

5 A That's right.

6 Q Didn't give it any thought at all?

7 A I completely forgot about it.

8 Q Forgot about what?

9 A You just stated what I forgot.

10 Q You didn't forget that you testified in your
11 deposition about having a license and, and being involved in
12 real estate in the service area, had you?

13 A I did not forget that. No.

14 Q No. Did you forget that there had been some
15 pleadings filed about, about this matter? About whether you
16 really worked for this agency or, or not when you --

17 MR. SHUBERT: Objection, Your Honor. What's the
18 relevance of what she recalls on the pleading cycle?

19 JUDGE LUTON: Sustained.

20 BY MR. GAMMON:

21 Q Okay. I'm getting there, Judge. I'm just, just
22 about wound up now. In the document we just got this morning,
23 the supplemental document production, it says here Alexia, on
24 the second last page, the telephone memo, Alexia, A-L-E-X-I-A
25 is IBC's receptionist. What is IBC?